

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 1:23-CV-24350-DPG-GAYLES/LOUIS

LAGUNITAS BREWING COMPANY dba)	
CERVECERIA LA TROPICAL, and)	
LA TROPICAL HOLDINGS B.V.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
SOLTURA, LLC dba BUCANERO USA,)	
)	
Defendant.)	
_____)	

**DEFENDANT’S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE REPLY
IN SUPPORT OF MOTION TO DISMISS**

Defendant, Soltura, LLC d/b/a Bucanero USA (“Soltura” or “Defendant”), by and through its undersigned counsel, pursuant to Fed. R. civ. P. 6(b)(1)(A) and Local Rule 7.1(a), hereby moves for an unopposed extension of time to file its Reply in Support of its Motion to Dismiss Plaintiff’s Complaint.

1. On December 6, 2023, Defendant filed a Motion to Dismiss (D.E. 10).
2. Plaintiff filed a Response in Opposition to the Motion on December 20, 2023, making the Reply due by December 27, 2023 (D.E. 14).
3. On December 21, 2023, Defendant’s counsel advised Plaintiff’s counsel that an extension of time through January 5, 2024 was needed to file a Reply for the Motion to Dismiss due to the impending holidays, related vacation schedules, and a death in the immediate family of lead defense counsel.
4. On December 22, 2023, Plaintiff’s counsel advised that there was no opposition to the request. On December 22, 2023, the parties filed their Joint Scheduling Report and submitted a

proposed Order to the Court (D.E. 16) in accordance with the Court's earlier Order (D.E. 12).

5. Due to holiday schedules and related vacations, Defendant was not in a position to file this Motion until today.

LOCAL RULE 7.1(a)(3)(CERTIFICATION)

Defendant's counsel certifies that on December 21, 2023, they conferred with Plaintiff's counsel, who indicated on December 22 that they would not oppose the requested extension of time.

WHEREFORE, Defendant Soltura respectfully requests that the Court grant this Unopposed Motion for Extension of Time for Defendant to file its Reply in Support of Motion to Dismiss, through January 5, 2024.

Respectfully submitted this 26th day of December, 2023.

/s/ Joseph A. Sacher

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